

# **DEBORAH J. BLUM, ESQ.**

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August 22<sup>nd</sup>, 2024

**Via CM/ECF**

The Hon. Judge Nicholas G. Garaufis  
United States District Court for The Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: KEITH ALAN RANIERE v. UNITED STATES OF AMERICA**  
**Case Nos. 1:18-CR-00204 & 1:24-CV-02925 &**  
**Final Request for Extension of Time to Amend Pro Se Motion to Vacate**  
**Under 28 U.S.C. § 2255**

Dear Hon. Judge Garaufis:

My office represents Keith Alan Ranieri (hereinafter referred to as “Mr. Ranieri”) in his 2225 application which is pending before the Court. Your Honor granted my office’s second request for a thirty-one (31) day extension of time to amend the 2255, [1260], to September 5<sup>th</sup>, 2024. At this time, for all of the reasons contained herein, I am requesting a final extension of time, thirty-two (32) days, to October 7<sup>th</sup>, 2024.

I understand that in my last request, that I told Your Honor that I would not request an additional extension absent extenuating circumstances. At that time, I was not part of Mr. Ranieri’s 2<sup>nd</sup> Circuit Court of Appeals matter (Case Nos. 24-1317, 24-1285 & 24-778). I joined the docket as co-counsel to Joseph Tully, Tully & Weiss, on July 19<sup>th</sup> and we requested, on consent, and received an extension of time to file the appeal to October 21<sup>st</sup>, 2024 [35]. The workload for both matters far exceeds any other case that I have worked on in my eighteen (18) year legal career and I was not fully anticipating that.

I have dedicated the work-week and weekends to working on the 2255 and still have a ways to go to get it fully drafted and ready to file<sup>1</sup>. On August 19<sup>th</sup> and 20<sup>th</sup>, I

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<sup>1</sup> I would also like for Your Honor to be aware that since October 7<sup>th</sup>, 2024, I have dedicated hundreds of hours, pro bono, to The Lawfare Project, a nonprofit organization which seeks to protect the human and civil rights of Jewish

met with Mr. Raniere for the first time, and spent six (6) hours with Mr. Raniere at USP Tucson in Arizona. During the visits, Mr. Raniere and I addressed his preferred strategy, which changes the course of the submission, and items that now need to be researched and incorporated into the draft. Further, it became clear to me that I would need to have an additional visit with him prior to being able to submit the 2255. An in-person visit is the most effective way for me to communicate with Mr. Raniere. It is unrealistic that the visit could occur within the next two (2) weeks given the staffing constraints at his facility. While at USP Tucson, I spoke with Correctional Counselor Aaron Nava and he is aware that I will be making this request for additional time with Mr. Raniere.

Thank you very much in advance for this Honorable Court's consideration of this request. I can best be reached on my mobile phone, (845) 304-5312 or through email, [deborah@deborahjblum.com](mailto:deborah@deborahjblum.com).

Very truly yours,



Deborah J. Blum

cc: Via Email  
Joseph Reccoppa  
Courtroom Deputy to  
The Hon. Judge Nicholas G. Garaufis

Nicholas J. Moscow, Esq.  
Deputy Chief, Criminal Appeals  
United States Attorney's Office for The Eastern District of New York

**Application granted.**  
**Sq Ordered.**

s/Nicholas G. Garaufis  
**Hon. Nicholas G. Garaufis**  
**Date:** 8/23/24

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communities. Since being engaged by Mr. Raniere, I have shifted my primary focus to his work, except for during my period of mourning. However, I am still actively representing two (2) clients through The Lawfare Project and putting together a groundbreaking legal action that aims to protect university students throughout the nation through enforcing Title VI and other protections. It is our hope for that action to be filed within the next few weeks to coincide with the start of the Fall 2024 school semester.